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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

Chapter 11

**MOTORS LIQUIDATION COMPANY, *et al.*,  
f/k/a General Motors Corp., *et al.*,**

Case No. 09-50026 (MG)

(Jointly Administered)

**Debtors.**

**JOINDER OF THE PARTICIPATING  
UNITHOLDERS IN WILMINGTON TRUST COMPANY’S  
MOTION FOR APPROVAL OF THE PARTICIPATING UNITHOLDERS’  
REQUESTED REIMBURSEMENT OF ATTORNEYS FEES AND EXPENSES<sup>1</sup>**

Certain unaffiliated holders (the “Participating Unitholders”) of more than 70 percent of the beneficial units (the “GUC Trust Units”) of the Motors Liquidation Company General Unsecured Creditors Trust (the “GUC Trust”), by and through their undersigned counsel, hereby join in the *Wilmington Trust Company’s Motion for Approval of the Participating Unitholders’ Requested Reimbursement of Fees and Expenses* [Docket No. 14762] (the “Fee Motion”) filed by Wilmington Trust Company (“Wilmington”), in its capacity as the trust administrator and trustee of the GUC Trust. In support of this joinder (the “Joinder”), the Participating Unitholders respectfully state as follows:

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<sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Fee Motion.

### **JOINDER**

1. The Participating Unitholders agree with the factual assertions and legal arguments set forth by Wilmington in the Fee Motion and, accordingly, file this Joinder thereto in support of reimbursing the Participating Unitholders for the fees and expenses they incurred of their counsel, Akin Gump Strauss Hauer & Feld LLP (“Akin Gump”). The Participating Unitholders believe that the requested reimbursement in the Fee Motion is imminently reasonable in light of the significant efforts and contributions made by the Participating Unitholders and Akin Gump as more fully set forth in Akin Gump’s letter dated June 30, 2020 attached to the Fee Motion as Exhibit A including, among other things, efforts in connection with resolving the ongoing contingent late claims being asserted against the GUC Trust as a result of certain recalls and the successes achieved as a result thereof for the benefits of all of the GUC Trust’s beneficiaries. The Participating Unitholders have been active participants both in and out of the bankruptcy proceedings in their steadfast pursuit to maximize value for all holders of GUC Trust Units and instrumental in achieving successful outcomes with respect to numerous issues advantageous to all holders of GUC Trust Units.

2. The Participating Unitholders expressly reserve the right to supplement, modify and amend this Joinder and/or raise additional arguments in support of the Fee Motion in writing or orally at the hearing on the Fee Motion.

*[Remainder of page intentionally left blank.]*

**CONCLUSION**

For the reasons set forth herein and in the Fee Motion, the Participating Unitholders respectfully request that the Court enter an order substantially in the form attached to the Fee Motion as Exhibit B granting the relief requested in the Fee Motion.

Dated: July 30, 2020  
New York, New York

Respectfully submitted,

**AKIN GUMP STRAUSS HAUER & FELD LLP**

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